

# **Plaintiffs' Exhibit 30**

## **(Redacted)**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**

**Alexandria Division**

UNITED STATES, et al.,	)	
	)	
Plaintiffs,	)	
v.	)	No. 1:23-cv-00108-LMB-JFA
	)	
GOOGLE LLC,	)	
	)	
Defendant.	)	

**DECLARATION OF ROSA M. ABRANTES-METZ  
IN SUPPORT OF PLAINTIFFS' OPPOSITION TO  
GOOGLE'S MOTION FOR SUMMARY JUDGMENT**

Rosa Abrantes-Metz, PhD., being duly cautioned, declares as follows:

1. I am over 21 years old and am competent to testify about the matters in this Declaration based on my personal knowledge.
2. Attached hereto as Exhibit A is a true and correct copy of the December 22, 2023, Expert Report of Rosa M. Abrantes-Metz, PhD. Attached hereto as Exhibit B is a true and correct copy of the February 13, 2024, Expert Rebuttal Report of Rosa M. Abrantes-Metz, PhD.
3. I authored the attached Expert Reports identified in Item (2) above and understood at the time I signed them that they were being prepared for use in this litigation. I am prepared to testify at trial, under oath, to the matters set forth in these reports. My statements set forth in these reports are true and correct to the best of my knowledge.
4. The exhibits attached to the reports described in Item (2) are true and correct copies.

I declare under penalty of perjury that the foregoing statements in this Declaration are true and correct.

Dated: \_\_\_\_\_  
Signed: Rosa M. Abrantes-Metz

Rosa M. Abrantes-Metz, PhD.

County and State: Orange County, NY

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

United States of America, *et al.*,

Plaintiffs,

v.

Google LLC,

Defendant.

Case No. 1:23-cv-00108-LMB-JFA

Hon. Leonie H. M. Brinkema

**EXPERT REBUTTAL REPORT OF ROSA M. ABRANTES-METZ, PH.D.**

**February 13, 2024**

Expert Rebuttal Report of Rosa M. Abrantes-Metz, Ph.D.

## G. Other Conduct by Google Exacerbated the Anticompetitive Effects of the Conduct at Issue

285. Dr. Israel and Professor Milgrom address other Google conduct which was discussed in my Initial Report including Project Bernanke, Project Poirot, and Sell-Side Dynamic Revenue Sharing (“DRS”).<sup>421</sup> [REDACTED], I do not explicitly allege that these programs were anticompetitive standing alone based on the information available to me,<sup>422</sup> but understanding these programs is critical to understanding the context of Google’s other anticompetitive conduct. My discussion of these programs is to show that they exacerbate the anticompetitive effects of the Google conduct at issue by directing more transactions toward AdX and denying those transactions and operating scale to third-party exchanges.
286. Specifically, Project Poirot “[REDACTED]  
[REDACTED].”<sup>423</sup> While “Last Look, [REDACTED]  
[REDACTED], DRS and Bernanke” [REDACTED]  
[REDACTED]  
[REDACTED].”<sup>424</sup> This exacerbated the impact of AdX’s exclusive First and Last Look. “Google’s programs such as Bernanke and DRS allow AdX advertisers with lower willingness to pay to sometimes win impressions over non-AdX

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<sup>420</sup> Abrantes-Metz Initial Report, at ¶ 460.

<sup>421</sup> Israel Initial Report, at ¶¶ 687 – 706, 750 – 761 and 766; Milgrom Initial Report, at ¶¶ 141 – 176, 192 – 251 and 365 – 413; and Abrantes-Metz Initial Report, at ¶¶ 258 – 291.

<sup>422</sup> Israel Initial Report, at ¶¶ 687, 751, and 766.

<sup>423</sup> Abrantes-Metz Initial Report, at ¶¶ 286 – 289.

<sup>424</sup> Abrantes-Metz Initial Report, at ¶¶ 358 – 362.

Expert Rebuttal Report of Rosa M. Abrantes-Metz, Ph.D.

advertisers with greater willingness to pay. This sacrifices advertiser surplus to Google's effort to capture transactions from its competitors."<sup>425</sup>

287. Nothing presented by Google's experts related to these programs alters my opinion that "These bid manipulation schemes exploited informational advantages that Google exclusively obtained by virtue of its scale. Through each program, Google's bid adjustments had the effect of allowing AdX to win transactions that might have otherwise been acquired by Google's rivals."<sup>426</sup>

288. [REDACTED]

## **V. Google's Experts Do Not Effectively Dispute That Google's Conduct Harmed Advertisers, Publishers and End-Consumers**

289. In my Initial Report, I describe how Google's conduct harmed publishers, advertisers, and end-consumers of open web content.<sup>428</sup> Google's conduct allowed AdX to charge a supra-

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<sup>425</sup> Abrantes-Metz Initial Report, at ¶ 479.

<sup>426</sup> Abrantes-Metz Initial Report, at ¶ 259.

<sup>427</sup> Israel Initial Report, at ¶¶ 694 – 697; Milgrom Initial Report, at ¶¶ 170 – 171, and 367.

<sup>428</sup> Abrantes-Metz Initial Report, at Section IX.

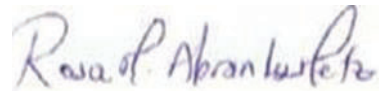
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316.

[REDACTED]

317. I reserve the right to update my opinions if and when more information becomes available.

Respectfully submitted,



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Rosa M. Abrantes-Metz, PhD

February 13, 2024

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[REDACTED]